

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America  
v.  
Antonio Lemar Woodard

Case: 2:22-mj-30355  
Assigned To : Unassigned  
Assign. Date : 8/22/2022  
CMP: USA v WOODARD (MAW)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 21, 2022 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)(1)	Felon in Possession of a Firearm

This criminal complaint is based on these facts:

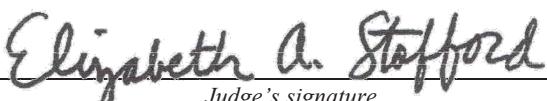
See attached affidavit.

Continued on the attached sheet.



Complainant's signature

Dionte Doris, Special Agent, ATF  
Printed name and title



Judge's signature

Hon. Elizabeth A. Stafford, United States Magistrate Judge  
Printed name and title

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: August 22, 2022

City and state: Detroit, MI

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Special Agent Dionte Doris, being first duly sworn, hereby state:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives. I have been a Special Agent since July of 2015. I graduated from the Special Agent Basic Training Program at the ATF National Academy and the Criminal Investigator Training Program at the Federal Law Enforcement Training Center. I have conducted multiple investigations into the unlawful possession and use of firearms, the possession and distribution of controlled substances, and conspiracies associated with firearm and narcotic offenses. Prior to being with the ATF, I was a police officer with the Metropolitan Nashville Police Department for five years. As a police officer, I conducted narcotic and gang investigations.

2. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, review of reports by myself and/or other law enforcement agents, and information gained through my training and experience. The information outlined below is provided for the limited

purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

3. ATF is currently conducting a criminal investigation concerning Antonio Lemar WOODARD (B/M; DOB: XX/XX/1989) for violations of 18 U.S.C. § 922(g)(1) (Felon in Possession of a Firearm).

**PROBABLE CAUSE**

4. I reviewed a computerized criminal history and Michigan Third Circuit Court records for WOODARD, which revealed the following felony convictions.

- a. On September 15, 2011, WOODARD pleaded guilty in Wayne County Third Circuit Court to one count of carrying a concealed weapon – attempt. WOODARD was sentenced to serve a term of twelve months of probation. WOODARD’s probation was extended on two occasions. He was discharged from probation in September 2015.
- b. On September 14, 2015, WOODARD pleaded guilty in Wayne County Third Circuit Court to one count of delivery and manufacture of marijuana. WOODARD was sentenced to serve a term of two years of probation. WOODARD’s probation was extended on two occasions. He was discharged from probation in December 2019.

5. Based on the above convictions to which WOODARD pleaded guilty, and his multiple probation terms exceeding four years, there is probable cause to believe WOODARD was aware of his status as a felon.

6. On August 21, 2022, at approximately 10:23 P.M., Detroit Police Department (DPD) officers on routine patrol pulled into the Citgo gas station at 13033 East Seven Mile Road, Detroit, Michigan. While driving through the parking lot, the officers observed a male—later identified as Antonio WOODARD—pumping gas into his vehicle. One of the officers observed the grip of a handgun sticking out of the front pocket of WOORDARD's shorts.

7. After seeing the handgun in WOODARD's pocket, the officer notified her partner of her observation and stopped their vehicle. Both officers exited the scout car and approached WOODARD. The officers seized a black Ruger EC9S 9mm handgun from the WOODARD's pocket. During his interaction with the officers, WOODARD told them the handgun belonged to his wife. Officers confirmed that WOODARD did not have a Concealed Pistol License and placed him under arrest.

8. On August 22, 2022, ATF Special Agent Nathan Triezenberg provided verbal confirmation the Ruger EC9S 9mm handgun was not manufactured in the State of Michigan and, therefore, has traveled in or affected interstate or foreign commerce.

## **CONCLUSION**

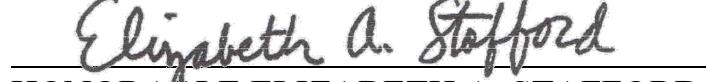
9. Based upon the aforementioned facts stated herein, there is probable cause to believe Antonio Lemar WOODARD (B/M; DOB: XX/XX/1989), a convicted felon aware of his felony convictions, did knowingly and intentionally possess a Ruger firearm, said firearm having affected interstate commerce, in violation of 18 U.S.C. 922(g)(1) (Felon in Possession of a Firearm). Said violation occurring on or about August 21, 2022, in the city of Detroit, in the County of Wayne, in the Eastern Judicial District of Michigan.

Respectfully submitted,



Dionte Doris  
Special Agent, ATF

Sworn to before me and signed in my presence and/or by reliable electronic means.



Elizabeth A. Stafford  
HONORABLE ELIZABETH A. STAFFORD  
United States Magistrate Judge

Dated: August 22, 2022